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5 Attorneys for Plaintiff
John Brown.

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

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11 JOHN BROWN,
12 Plaintiff,
13 vs.
14 TAKEUCHI MFG. CO. (U.S.), LTD, et al.
15 Defendant(s).
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18) Case No. 2:21-cv-00392-JAM-DMC
19) STIPULATION AND ORDER TO
20) CONTINUE THE DEFENDANT UNITED
21) RENTALS (NORTH AMERICA) INC.'S
22) MOTION TO DISMISS AND TO
23) ESTABLISH PLAINTIFF JOHN BROWN'S
24) DEADLINE TO RESPOND TO THE
25) MOTION
26) Action Filed: March 3, 2021
27) Date: June 22, 2021
28) Time: 1:30 PM
Dept: Courtroom 6, 14th Floor
)

18 WHEREAS, on April 1, 2021, Defendant UNITED RENTALS (NORTH AMERICA)
19 INC. (hereinafter "United Rentals") filed a motion to dismiss under FRCP Rule 12(b)(6);

20 WHEREAS, on May 15, 2021, Defendant TAKEUCHI MFG. CO. (U.S.), LTD.
21 (hereinafter "Takeuchi") filed a motion to dismiss under FRCP Rule 12(b)(6);

22 WHEREAS, Plaintiff JOHN BROWN'S response is due on June 1, 2021;

23 WHEREAS, the Plaintiff and United Rentals and Takeuchi are in agreement to continue
24 the date of motion and the corresponding response date;

25 WHEREAS, the Plaintiff and United Rentals and Takeuchi have met and conferred
26 regarding the motion to dismiss;

28 1 2:21-CV-00392-JAM-DMC
STIPULATION AND ORDER TO CONTINUE THE DEFENDANT UNITED RENTALS
(NORTH AMERICA) INC.'S MOTION TO DISMISS AND TO ESTABLISH PLAINTIFF
JOHN BROWN'S DEADLINE TO RESPOND TO THE MOTION

1 ACCORDINGLY, IT IS SO STIPULATED, by and between the parties and
2 through their counsel, as follows:

3 1. United Rentals Motion to Dismiss and Takeuchi's Motion to Dismiss be
4 continued to July 27, 2021 or thereafter;
5 2. Plaintiff's deadline to respond to the motions to dismiss is June 14, 2021.

6 Dated: May 28, 2021

7 ACQUEST LAW

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9 /S/ *Nareshwar Singh Virdi*
10 Nareshwar S. Virdi
11 Attorneys for Plaintiff
12 John Brown

13 Dated: May 28, 2021

14 GORDON & REES LLP

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16 /S/ *Russell M. Mortyn*
17 Russell M. Mortyn
18 Attorneys for Defendants
19 United Rentals (North America) Inc.

20 Dated: March 28, 2021

21 BOWMAN AND BROOKE LLP

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23 /S/ *Neil M. Kliebenstein*
24 Neil M. Kliebenstein
25 Attorneys for Defendant
26 Takeuchi Mfg. Co. (U.S.), Ltd.

27 IT IS SO ORDERED.

28 Dated: June 3, 2021

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3 /s/ *John A. Mendez*
4 THE HONORABLE JOHN A. MENDEZ
5 UNITED STATES DISTRICT COURT JUDGE